

AEML DISTRIBUTION (AEML-D) MULTI YEAR TARIFF (MYT) PETITION

EXECUTIVE SUMMARY



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1 INTRODUCTION

The Hon'ble Commission issued the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2019 (hereinafter referred to as the "MYT Regulations, 2019") on 01-08-2019. Further, the Hon'ble Commission has notified the Maharashtra Electricity Regulatory Commission (Multi Year Tariff) Regulations, 2024 (hereinafter referred to as the "MYT Regulations, 2024") on 19-08-2024.

Now, as per MYT Regulations, 2019 and MYT Regulations, 2024, AEML-D is filing the instant petition for truing up of FY 2023-24 and FY 2024-25 and provisional truing-up of FY 2024-25 and ARR and tariff projections for FY 2025-26 to FY 2029-30. The truing-up and provisional truing-up of FY 2022-23 to FY 2024-25 shall be carried out under MYT Regulations, 2019 and the ARR and tariff projections for the next Control Period (FY 2025-26 to FY 2029-30) shall be evaluated as per the terms of the MYT Regulations, 2024.



2 TRUING UP OF FY 2022-23

The summary of truing up of FY 2022-23 is shown in the table below:

 Table 1: Revenue Gap/(surplus) of Wires and Supply Business for FY 2022-23

Particulars / (Rs. Crore)	MTR ORDER			ACTUALS			
	Wire	Retail	Total	Wire	Retail	Total	
Power purchase (inclusive of InSTS, Standby & SLDC)		6,588.43	6,588.43		6,028.93	6,028.93	
Operation & Maintenance expenditure	940.89	468.69	1,409.58	952.97	475.01	1,427.98	
Depreciation	377.47	23.66	401.13	404.26	45.52	449.78	
Interest on long-term loan	208.41	1.46	209.87	224.78	7.50	232.28	
Financing, Refinancing charges, FERV,				3.68	0.09	3.77	
PV of interest cost saving							
Return on Equity	497.85	31.59	529.44	551.53	43.29	594.82	
Interest on working capital	34.29		34.29	30.31	1.72	32.03	
Interest on CSD		20.85	20.85	3.36	16.67	20.03	
Bad-debts written off	2.63	11.74	14.37	2.77	11.71	14.48	
Contribution to contingency reserve		1.26	1.26		1.36	1.36	
Less: Non-Tariff Income	140.55	65.14	205.69	142.51	83.65	226.16	
Less: Income from Other Business	3.27		3.27	3.70		3.70	
DSM EV charger					0.22	0.22	
D-loss efficiency gain					22.92	22.92	
ARR adjustment		52.38	52.38		52.38	52.38	
Total ARR	1,917.73	7,134.91	9,052.64	2,027.45	6,623.68	8,651.12	
Revenue from Own consumers	1,362.68	6,730.82	8,093.50	1,249.73	6,206.51	7,456.24	

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Particulars / (Rs. Crore)		MTR ORDER	ACTUALS			
	Wire	Retail	Total	Wire	Retail	Total
Wheeling revenue from CO & OA consumers	230.89		230.89	234.62		234.62
CSS revenue		74.06	74.06		69.95	69.95
Revenue due to selective loyalty		5.00	5.00		5.00	5.00
rebate given to consumers						
Penalty for non-submission of data		0.01	0.01		0.01	0.01
Total Revenue	1,593.57	6,809.89	8,403.46	1,484.34	6,281.47	7,765.81
Gap / (Surplus)	324.16	325.03	649.18	543.10	342.21	885.31
Incremental Gap / (Surplus)				218.95	17.18	236.13

It is submitted that on comparison of the actual Total ARR vis-à-vis approved ARR, the increase in Wires ARR by ~ Rs. 220 Crore is primarily on account of the following:

- Reduction in wheeling revenue due to actual sales being lower than approved sales ~ Rs. 113 Crore.
- Increase on account of capex due to actuals being more than approved and additional RoE claimed in truing up vis-à-vis base RoE approved in MTR Order ~ Rs. 97 Crore.
- Increase in Opex ~ Rs. 12 Crore: In the MTR Order, Opex approved at normative levels on provisional basis. Opex being claimed now
 is based on Actuals and on net entitlement basis.

It is submitted that on comparison of the actual Total ARR vis-à-vis approved ARR, the increase in Retail ARR by ~ Rs. 17 Crore is primarily on account of the following:

• Reduction in revenue due to actual sales being lower than approved sales ~ Rs. 530 Crore.



- Reduction in power purchase cost due to lower requirement ~ Rs. 375 Crore.
- Reduction in cost due non consideration of standby charges ~ Rs. 185 Crore.
- Increase on account of capex due to actuals being more than approved and additional RoE claimed in truing up vis-à-vis base RoE approved in MTR Order ~ Rs. 40 Crore.
- Increase in Opex ~ Rs. 6 Crore: In the MTR Order, Opex approved at normative levels on provisional basis. Opex being claimed now
 is based on Actuals and on net entitlement basis.
- ~ Rs. 22 Cr on account of AEML-D share of efficiency gains in distribution loss.
- Increase in NTI vis-à-vis approved ~ Rs. 19 Crore.

3 TRUING UP OF FY 2023-24

The summary of truing up of FY 2023-24 is shown in table below:

Table 2: Revenue Gap/(surplus) of Wires and Supply Business for FY 2023-24

Particulars / (Rs. Crore)		MTR ORDER	!	ACTUALS			
	Wire	Retail	Total	Wire	Retail	Total	
Power purchase (inclusive of InSTS, Standby & SLDC)		6,053.20	6,053.20		5,786.73	5,786.73	
Operation & Maintenance expenditure	981.23	488.97	1,470.20	997.34	498.29	1,495.64	
Depreciation	408.84	27.31	436.15	424.45	63.34	487.79	
Interest on long-term loan	215.39	4.24	219.63	243.19	15.69	258.88	
Financing, Refinancing charges, FERV,				99.56	6.38	105.93	
PV of interest cost saving							
Return on Equity	532.50	36.33	568.83	594.73	54.59	649.32	
Interest on working capital	46.70		46.70	28.64	3.42	32.06	

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Particulars / (Rs. Crore)		MTR ORDER			ACTUALS			
	Wire	Retail	Total	Wire	Retail	Total		
Interest on CSD		53.91	53.91	7.63	25.14	32.77		
Bad-debts written off	2.63	11.74	14.37	3.88	11.08	14.96		
Contribution to contingency reserve		1.47	1.47		1.98	1.98		
Less: Non-Tariff Income	147.57	68.39	215.96	156.16	81.82	237.97		
Less: Income from Other Business	3.60		3.60	3.32		3.32		
D-loss efficiency gain					25.36	25.36		
Past Gap	911.11	261.61	1,172.72	911.11	261.61	1,172.72		
ARR adjustment	(398.68)		(398.68)	(398.68)		(398.68)		
Total ARR	2,548.54	6,870.39	9,418.94	2,752.39	6,671.78	9,424.17		
Revenue from Own consumers	2,191.37	7,227.05	9,418.42	2,016.13	6,647.92	8,664.06		
Wheeling revenue from CO & OA consumers	358.03		358.03	344.85		344.85		
CSS revenue		113.39	113.39		90.94	90.94		
Total Revenue	2,549.40	7,340.44	9,889.84	2,360.99	6,738.86	9,099.85		
Gap / (Surplus)	(0.85)	(470.05)	(470.90)	391.40	(67.08)	324.32		

It is submitted that the gap in Wires ARR is ~ Rs. 390 Crore primarily on account of the following:

- Reduction in wheeling revenue due to actual sales being lower than approved sales ~ Rs. 190 Crore.
- Increase on account of capex due to actuals being more than approved and additional RoE claimed in truing up vis-à-vis base RoE approved in MTR Order ~ Rs. 106 Crore.
- Realised loss on FERV being claimed at the time of realisation ~ Rs. 95 Crore.



It is submitted that the surplus in Retail ARR is ~ Rs. 67 Crore. As submitted above, there is a surplus of ~ Rs. 470 Crore as approved in the MTR Order. The variation of ~ Rs. 400 Crore is primarily on account of the following:

- Reduction in revenue due to actual sales being lower than approved sales ~ Rs. 600 Crore.
- Reduction in power purchase cost due to lower requirement ~ Rs. 82 Crore.
- Reduction in cost due non consideration of standby charges ~ Rs. 185 Crore.
- Increase on account of capex due to actuals being more than approved and additional RoE claimed in truing up vis-à-vis base RoE approved in MTR Order ~ Rs. 66 Crore.
- ~ Rs. 25 Cr on account of AEML-D share of efficiency gains in distribution loss.
- Realised loss on FERV being claimed at the time of realisation ~ Rs. 6 Crore.
- Increase in NTI vis-à-vis approved ~ Rs. 13 Crore.

4 PROVISIONAL TRUING UP OF FY 2024-25

The summary of provisional truing up of FY 2024-25 is shown in table below:

Particulars / (Rs. Crore)		MTR ORDER			ESTIMATES			
	Wire	Retail	Total	Wire	Retail	Total		
Power purchase (inclusive of InSTS, Standby & SLDC)		6,650.27	6,650.27		6,767.80	6,767.80		
Impact of Change in law					300.63	300.63		
Operation & Maintenance expenditure	1,023.29	510.13	1,533.42	1,054.28	527.56	1,581.84		
Depreciation	437.64	31.86	469.50	443.56	80.05	523.61		
Interest on long-term loan	216.49	7.89	224.38	268.86	22.46	291.32		
Return on Equity	564.23	42.23	606.46	585.18	58.52	643.70		

 Table 3: Provisional Revenue Gap/(surplus) of Wires and Supply Business for FY 2024-25



Particulars / (Rs. Crore)		MTR ORDER			ESTIMATES			
	Wire	Retail	Total	Wire	Retail	Total		
Interest on working capital	55.40		55.40	43.98	13.64	57.62		
Interest on CSD		55.55	55.55	9.28	30.58	39.86		
Provision for Bad and Doubtful Debts	2.63	11.74	14.37	4.00	11.43	15.43		
Contribution to contingency reserve		1.68	1.68		2.25	2.25		
Less: Non-Tariff Income	154.95	71.81	226.76	279.75	87.41	367.16		
Less: Income from Other Business	3.96		3.96	3.49		3.49		
Aggregate Revenue Requirement (ARR)	2,140.77	7,239.53	9,380.30	2,125.90	7,727.51	9,853.41		
Past gap	1,053.59	(84.18)	969.41	1,053.59	(84.18)	969.41		
Total ARR	3,194.36	7,155.36	10,349.72	3,179.49	7,643.33	10,822.82		
Revenue from Own consumers (excluding FAC)	2,754.49	7,594.46	10,348.95	2,602.76	7,202.23	9,804.99		
FAC revenue from Own consumers					1,215.45	1,215.45		
Wheeling revenue from CO & OA consumers	440.80		440.80	406.41		406.41		
CSS revenue		69.11	69.11		48.77	48.77		
Total Revenue	3,195.29	7,663.57	10,858.86	3,009.17	8,466.45	11,475.63		
Gap / (Surplus)	(0.93)	(508.21)	(509.14)	170.32	(823.13)	(652.80)		

The estimated gap likely to accrue in Wires business for FY 2024-25 is ~ Rs. 170 crore, primarily on account of the following:

- Increase in provisional depreciation, interest and RoE as compared to the expenses considered in MTR Order due to increased capitalization ~ Rs. 80 crore.
- Increase in revised Normative Opex vis-à-vis that approved in the MTR Order ~ Rs. 30 crore.
- Projected reduction in wheeling revenue due to projected sales being lower than approved sales ~ Rs. 185 crore.



• Estimated recovery of arrears of AIH charges ~ Rs. 120 crore.

There is an estimated surplus in Supply business for FY 2024-25 to the extent of ~ Rs. 820 crore. As submitted above, there is a surplus of ~ Rs. 510 crore as approved in the MTR Order. The variation of ~ Rs. 310 crore is primarily on account of the following:

- Projected increase in revenue due to FAC being levied as per the approval of the Hon'ble Commission from time to time as well as
 estimated revenue from FAC for the balance period till March 2025 which is offsetting the projected revenue in retail revenue due
 to projected sales being lower than approved sales ~ Rs. 800 crore.
- Increase in power purchase cost ~ Rs. 300 crore considering H1 provisional actuals and H2 estimates.
- Reduction on account of standby charges not paid by AEML-D but considered as cost in the approved ARR ~ Rs. 185 crore.
- Increase in cost due to impact of Change in Law ~ Rs. 300 crore.
- Increase in provisional depreciation, interest and RoE as compared to the expenses considered in MTR Order due to increased capitalization ~ Rs. 80 crore.



5 PAST PERIOD ADJUSTMENT

There are certain past period adjustments in the Supply business for which AEML-D is claiming the same along with carrying / holding cost till FY 2025-26 as follows:

Table 4: Past period adjustment

Particulars/ Rs. Crore	FY 2025-26
ADTPS surplus	(57.31)
Capex approval impact	3.45
ADSM charges	10.41
Total	(43.45)

6 AEML-D REVENUE GAP/ (SURPLUS) TILL FY 2024-25

The revenue gap / (surplus) for FY 2022-23, FY 2023-24 and FY 2024-25 along with the associated carrying / holding cost till FY 2025-26 is proposed to be recovered entirely in FY 2025-26. The impact of the same is as follows:

 Table 5: Past gap / (surplus) till FY 2024-25 for recovery in FY 2025-26 Wires

Wires / Rs. Crore	Principal	Carrying cost	Total
FY 2022-23 incremental	218.95	115.75	334.70
FY 2023-24 standalone	391.40	81.05	472.45
FY 2024-25 standalone	170.32		170.32
Total	780.67	196.80	977.47

 Table 6: Past gap / (surplus) till FY 2024-25 for recovery in FY 2025-26 Supply

Supply / Rs. Crore	Principal	Carrying cost	Total
FY 2022-23 incremental	17.18	20.87	38.06
FY 2023-24 standalone	(67.08)	(13.89)	(80.97)
FY 2024-25 standalone	(823.13)		(823.13)
Total	(873.03)	6.98	(866.04)



7 AGGREGATE REVENUE REQUIREMENT FOR FY 2025-26 TO FY 2029-30

The summary of the ARR for each year of the Control Period i.e. FY 2025-26 to FY 2029-30 is as under:

Table 7 : ARR for FY 2025-26 to FY 2029-30

ARR / Rs. Crore		FY 2025-26			FY 2026-27			FY 2027-28		
	Wire	Retail	Total	Wire	Retail	Total	Wire	Retail	Total	
Power purchase		6,549.74	6,549.74		7,260.90	7,260.90		8,590.56	8,590.56	
InSTS, STU and SLDC charges		846.81	846.81		754.26	754.26		892.13	892.13	
Operation & Maintenance expenditure	1,239.03	620.08	1,859.12	1,425.54	665.30	2,090.84	1,641.94	704.74	2,346.68	
TOTEX model for Smart Meter		89.55	89.55		165.65	165.65		241.76	241.76	
Depreciation	469.28	53.69	522.97	512.25	57.73	569.98	556.98	56.10	613.08	
Interest on long-term loan	298.55	32.49	331.04	334.18	34.55	368.73	375.49	29.29	404.78	
Return on Equity	710.33	81.16	791.49	780.75	88.24	868.99	859.62	88.26	947.89	
Interest on working capital	52.25		52.25	44.99		44.99	50.13		50.13	
Interest on CSD	10.26	33.84	44.11	11.25	37.11	48.36	12.24	40.37	52.61	
Provision for Bad and Doubtful Debts	4.00	11.43	15.44	4.00	11.43	15.44	4.00	11.43	15.44	
Contribution to contingency reserve		2.88	2.88		3.43	3.43		3.44	3.44	
Less: Non-Tariff Income	209.74	91.77	301.52	220.30	96.32	316.62	351.39	101.07	452.46	
Less: Income from Other Business	3.66		3.66	3.84		3.84	4.03		4.03	
Aggregate Revenue Requirement (ARR)	2,570.31	8,229.89	10,800.20	2,888.82	8,982.29	11,871.11	3,144.99	10,557.01	13,701.99	
Past impact		(43.45)	(43.45)							
AEML-D past gap till FY 2024-25	977.47	(866.04)	111.43							
Total ARR	3,547.78	7,320.40	10,868.18	2,888.82	8,982.29	11,871.11	3,144.99	10,557.01	13,701.99	



ARR / Rs. Crore		FY 2028-29	9	FY 2029-30			
	Wire	Retail	Total	Wire	Retail	Total	
Power purchase		9,129.11	9,129.11		10,246.77	10,246.77	
InSTS, STU and SLDC charges		1,010.84	1,010.84		1,108.57	1,108.57	
Operation & Maintenance expenditure	1,891.44	746.77	2,638.21	2,164.81	791.72	2,956.53	
TOTEX model for Smart Meter		317.90	317.90		320.61	320.61	
Depreciation	603.72	55.46	659.18	657.80	52.81	710.62	
Interest on long-term loan	422.29	24.12	446.40	467.30	19.10	486.40	
Return on Equity	946.94	88.26	1,035.21	1,036.78	88.26	1,125.04	
Interest on working capital	58.96		58.96	67.54		67.54	
Interest on CSD	13.23	43.63	56.86	14.22	46.89	61.11	
Provision for Bad and Doubtful Debts	4.00	11.43	15.44	4.00	11.43	15.44	
Contribution to contingency reserve		3.44	3.44		3.44	3.44	
Less: Non-Tariff Income	285.04	106.04	391.07	299.36	111.23	410.59	
Less: Income from Other Business	4.24		4.24	4.45		4.45	
Aggregate Revenue Requirement (ARR)	3,651.31	11,324.91	14,976.22	4,108.65	12,578.37	16,687.02	
Past impact							
AEML-D past gap till FY 2024-25							
Total ARR	3,651.31	11,324.91	14,976.22	4,108.65	12,578.37	16,687.02	



8 ALLOCATION OF ASSETS AND COST AT DIFFERENT VOLTAGES

The Hon'ble Commission has issued the 'Guidelines for allocation of assets and cost at different voltage levels of distribution', based on which the Wires ARR is split into corresponding voltages of HT and LT.

Table 8: FY 2025-26 to FY 2029-30 projected Wires ARR bifurcation voltage wise

Rs. Crore	FY 2025-26		FY 2026-27			FY 2027-28			
	НТ	LT	Total	ΗT	LT	Total	HT	LT	Total
Wires ARR	1,027.02	2,520.76	3,547.78	822.79	2,066.02	2,888.82	905.45	2,239.54	3,144.99

Rs. Crore		FY 2028-29			FY 2029-30	
	HT	LT	Total	HT	LT	Total
Wires ARR	1,015.11	2,636.20	3,651.31	1,120.54	2,988.11	4,108.65

Based on the above, the wheeling charges is worked out for HT and LT for each year of the Control Period.

9 TARIFF PROPOSAL

9.1 Merging of categories / sub-categories / slabs

AEML-D is proposing the merging of categories / sub-categories / slabs as follows:

Table 9: Proposed merging of categories / sub-categories / slabs

Energy Charges	Existing	Proposed
LT Residential	0-100	0-100
	101-300	101-300
	301-500	> 300
	> 500	
LT Commercial	(a) 0-20 kW	(a) 0-20 kW
	(b) 20-50 kW	(b) > 20 kW
	(c) > 50 kW	(U) / 20 KW
LT-Public Service	LT-PS (Government)	LT-PS
	LT-PS (Others)	
HT-Public Service	HT-PS (Government)	HT-PS
	HT-PS (Others)	



9.2 Wheeling Charges

AEML-D in this petition is proposing the kVAh tariff for LT category consumers with loan > 20 kW in addition to the existing kVAh tariff for EHT and HT category consumers. The summary of proposed wheeling charges along with the prevailing wheeling charges is shown in the table below:

Particulars	FY 24-25	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
	(Existing)					
HT Wheeling	1.17	0.75	0.56	0.57	0.59	0.62
charges (Rs./kWh)						
HT Wheeling	1.14	0.74	0.55	0.56	0.58	0.61
Charge (Rs./kVAh)						
LT Wheeling	2.60	2.95	2.25	2.30	2.53	2.71
charges (Rs./kWh)						
LT Wheeling	-	2.73	2.08	2.13	2.34	2.50
Charge (Rs./kVAh) –						
for load > 20 kW						

Table 10: Existing Wheeling Charges and Proposed Wheeling Charges

9.3 Cross Subsidy Surcharge

The category wise CSS proposed for each year of the Control Period, computed in accordance with the Tariff Policy 2016 formula along with the prevailing CSS is shown in the table below:

Particulars	FY 24-25	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
	(Existing) *					
LT Category						
LT I: Residential	0.01		0.43	0.43	0.45	0.43
LT II (a): Non-	1.33	0.25	0.99	1.03	1.06	1.01
Residential or						
Commercial - 0-20						
kW						
LT II (b): Non-	1.75	0.71	1.44	1.52	1.55	1.52
Residential or						
Commercial - > 20 kW						

 Table 11: Existing and Proposed CSS



Particulars	FY 24-25	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
	(Existing) *					
LT III (a): LT Industrial	0.62					
upto 20 kW						
LT III (b): LT Industrial	1.53	0.07	0.74	0.78	0.78	0.72
above 20 kW						
LT IV: Public Services	0.98					
LT IV (B): Public	1.28			0.11	0.21	0.24
Services - Others						
LT VI: EV Charging	0.48		0.37	0.39	0.47	0.53
Stations						
LT V (a): Agriculture -					0.15	0.21
Pumpsets						
LT V (b): Agriculture -	1.11			0.04	0.33	0.39
Others						
HT Category						
HT I: Industry	1.72	0.18	0.90	0.90	0.91	0.90
HT II: Commercial	1.70	0.47	1.18	1.21	1.22	1.22
HT III: Group Housing	1.70	0.12	0.82	0.91	0.90	0.89
Society						
HT IV: Railways,		1.15	1.61	1.71	1.73	1.82
Metro and Monorail						
HT V: Public Services	1.65					
HT V (b): Public	1.71	0.02	0.75	0.72	0.71	0.83
Service - Others						
HT VI: EV Charging	1.60		0.06	0.07	0.14	0.20
Stations						

* Existing CSS is in Rs./kVAh for HT and Rs./kWh for LT

Note: For the Control Period, the CSS in the above table is denominated in:

- a. Rs./kVAh for HT categories, LT II (b): Non-Residential or Commercial > 20 kW, LT III (b): LT Industrial above 20 kW and LT VI: EV Charging Stations
- b. Rs./kWh for other LT categories.

9.4 Average Cost of Supply (ACoS)

Based on the ARR projections and forecast of energy sales, the Average Cost of Supply (ACoS) is worked out as follows:



Table 12: Projected Total ACoS

Particulars / Rs. Crore	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
ACoS Rs./kWh	8.54	8.55	9.09	9.17	9.64

9.5 Retail Average Cost of Supply (RACoS)

It is submitted that the MYT Regulations, 2024 provide that the retail supply tariff and cross-subsidy shall be determined with reference to the average cost of supply determined for retail supply business alone. In this regard, the Retail Average Cost of Supply or RACoS for the control period is as follows:

 Table 13: Projected Retail ACoS

Particulars / Rs. Crore	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
Retail ACoS Rs./kWh	6.00	6.65	7.18	7.11	7.45

9.6 Tariff Revision

As elaborated above on the principle regarding to setting up of tariffs and cross-subsidy considering the RACoS and the proposed recovery of the past gap, the proposed revision in Retail tariffs required is as follows:

 Table 14: Tariff revision for the Control Period

Particulars	FY 24-25	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
ACoS Rs./kWh	10.03 *	8.54	8.55	9.09	9.17	9.64
Tariff revision		(14.86%)	0.05%	6.31%	0.95%	5.14%

Particulars	FY 24-25	FY 25-26	FY 26-27	FY 27-28	FY 28-29	FY 29-30
Retail ACoS Rs./kWh	7.62 *	6.00	6.65	7.18	7.11	7.45
Tariff revision		(21.21%)	10.74%	7.95%	(0.90%)	4.73%

* existing including FAC

The average tariffs of each consumer category shall be equal to the Retail Average Tariff (or Retail ACoS) plus the HT or LT Wheeling Charge as the case may be.

The RACoS and Total Cost of Supply (RACoS + Allocated per unit Wires cost) of AEML-D for each year of the Control Period is as shown in the table below:



Particulars / Rs./kWh	FY	FY	FY	FY	FY	FY
	24-25	25-26	26-27	27-28	28-29	29-30
	(Existing)					
Retail ACoS	7.62	6.00	6.65	7.18	7.11	7.45
Retail ACoS + HT Wheeling charge	8.79	6.76	7.20	7.74	7.70	8.07
Retail ACoS + LT Wheeling charge	10.22	8.95	8.90	9.48	9.64	10.15
HT % tariff revision		(23.14%)	6.63%	7.48%	(0.52%)	4.72%
LT % tariff revision		(12.43%)	(0.57%)	6.53%	1.70%	5.33%

Table 15: Retail ACoS and Total Cost of Supply

9.7 Fixed Charges and Demand Charges

The category wise proposed fixed and demand charges for each year of the Control Period along with the existing fixed / demand charges are shown in the table below:

Fixed/ Demand Charges	FY	FY	FY	FY	FY	FY
	24-25	25-26	26-27	2027-28	28-29	29-30
EHT Category *						
EHT IV - Metro & Monorail	400	425	450	475	500	525
HT Category *						
HT I: HT-Industry	400	425	450	475	500	525
HT II: HT- Commercial	400	425	450	475	500	525
HT III: HT-Group Housing Society	400	425	450	475	500	525
HT IV - HT Metro & Monorail	400	425	450	475	500	525
HT V - PS	400	425	450	475	500	525
HT VI - EV Charging Stations	80					
LT Category						
LT I - Below Poverty Line	12	12	14	14	14	15
LT -I Residential (Single Phase)						
0-100	90	115	140	160	180	200
101-300	135	160	185	205	225	245
301-500	135	160	185	205	225	245
LT -I Residential (Three Phase)						
0-100	160	160	185	205	225	245
101-300	160	160	185	205	225	245
301-500	160	160	185	205	225	245

Table 16: Existing and Proposed Fixed / Demand charges



Fixed/ Demand Charges	FY	FY	FY	FY	FY	FY
	24-25	25-26	26-27	2027-28	28-29	29-30
LT II (a) - 0-20 kW	475	500	525	550	575	600
LT II (b) > 20 kW *	400	425	450	475	500	525
LT III (a) - LT Industrial upto 20 kW	475	500	525	550	575	600
LT III (b) - LT Industrial above 20 kW *	400	425	450	475	500	525
LT IV - PS	465	490	515	540	565	590
LT V (a): Agriculture - Pumpsets	45	70	95	120	145	170
LT V (b): Agriculture – Others *	100	125	150	175	200	225
LT VI: EV Charging Stations *	80					

* Demand charges in Rs./kVA/month.

For other categories, Fixed charges in Rs./month.

9.8 Energy Charges

The category wise proposed energy charges for each year of the Control Period along with the existing energy charges (inclusive of FAC) are shown in the table below:

Table 17: Existing and Proposed Energy charges

Energy Charges	FY	FY	FY	FY	FY	FY
	24-25	25-26	26-27	27-28	28-29	29-30
	(with FAC) *					
EHT Category						
EHT IV - Metro & Monorail	7.40	4.40	4.90	5.30	5.10	5.30
HT Category						
HT I: HT-Industry	7.85	4.70	5.25	5.65	5.50	5.75
HT II: HT- Commercial	8.05	4.80	5.35	5.75	5.60	5.85
HT III: HT-Group Housing Society	7.25	4.75	5.30	5.80	5.65	5.90
HT IV - HT Metro & Monorail	7.40	4.40	4.95	5.35	5.10	5.30
HT V: PS	9.28	4.75	5.35	5.75	5.60	5.65
HT VI: EV Charging Stations	8.21	5.50	6.10	6.60	6.60	7.00
LT Category						
LT I - Below Poverty Line	2.65	2.00	2.20	2.40	2.60	2.80
LT -I Residential (Single Phase)	-	-	-	-	-	-
0-100	3.80	3.45	4.15	4.65	4.65	5.05
101-300	6.50	5.95	6.55	7.00	6.85	7.10
301-500	8.86	6.90	7.11	7.49	7.23	7.41



Energy Charges	FY	FY	FY	FY	FY	FY	
	24-25	25-26	26-27	27-28	28-29	29-30	
	(with FAC) *						
LT -I Residential (Three Phase)	-	-	-	-	-	-	
0-100	3.80	3.45	4.15	4.65	4.65	5.05	
101-300	6.50	5.95	6.55	7.00	6.85	7.10	
301-500	9.41	6.90	7.11	7.49	7.23	7.41	
LT II (a) - 0-20 kW	6.90	5.10	5.75	6.30	6.25	6.55	
LT II (b) > 20 kW	7.39	4.55	5.10	5.55	5.40	5.60	
LT III (a) - LT Industrial upto 20 kW	6.95	5.00	5.65	6.25	6.20	6.55	
LT III (b) - LT Industrial above 20 kW	7.15	4.50	5.00	5.45	5.30	5.50	
LT IV - PS	7.85	5.05	5.70	6.30	6.25	6.55	
LT V (a): Agriculture – Pumpsets	5.15	4.70	5.25	5.85	5.85	6.15	
LT V (b): Agriculture - Others	7.30	5.00	5.80	6.50	6.70	7.10	
LT VI: EV Charging Stations	6.20	5.60	6.20	6.70	6.70	7.10	

* Existing Energy charges is in Rs./kVAh for HT and Rs./kWh for LT

Note: For the Control Period, the Energy charge in the above table is denominated in:

- a. Rs./kVAh for EHT categories, HT categories, LT II (b): Non-Residential or Commercial > 20 kW, LT III (b): LT Industrial above 20 kW and LT VI: EV Charging Stations
- b. Rs./kWh for other LT categories.



9.9 Category wise Tariff Revision

The proposed percentage revision for consumer categories considering the proposed tariffs is as follows:

Tariff Revision (%) EHT Category	FY	FY FY		FY		FY		FY		FY	
	24-25	25-26		26	-27	27-28		28-29		29-30	
EHT IV - Metro & Monorail	9.59	6.13	-36%	6.77	11%	7.30	8%	7.13	-2%	7.42	4%
HT Category											
HT I: HT-Industry	10.38	6.79	-35%	7.24	6%	7.74	7%	7.70	-1%	8.05	5%
HT II: HT- Commercial	10.76	7.09	-34%	7.53	6%	8.07	7%	8.03	-1%	8.39	5%
HT III: HT-Group Housing Society	9.67	6.74	-30%	7.18	7%	7.77	8%	7.71	-1%	8.06	5%
HT IV - HT Metro & Monorail	11.30	7.83	-31%	8.35	7%	8.93	7%	8.83	-1%	9.21	4%
HT V: PS	11.66	6.62	-43%	7.08	7%	7.56	7%	7.50	-1%	7.98	6%
HT VI: EV Charging Stations	9.56	5.98	-37%	6.38	7%	6.89	8%	6.92	0%	7.35	6%
Sub-total	10.77	6.82	-37%	7.28	7%	7.78	7%	7.73	-1%	8.11	5%
LT Residential	9.23	8.74	-5%	8.67	-1%	9.23	6%	9.39	2%	9.91	6%
LT I - Below Poverty Line	9.97	9.66	-3%	9.82	2%	9.80	0%	9.98	2%	10.52	5%
LT -l Residential (Single Phase)											
0-100	6.74	6.84	2%	6.91	1%	7.51	9%	7.77	4%	8.38	8%
101-300	10.15	10.15	0%	10.17	0%	10.75	6%	10.89	1%	11.37	4%
301-500	12.37	10.90	-12%	10.57	-3%	11.13	5%	11.23	1%	11.71	4%
LT -l Residential (Three Phase)											
0-100	6.69	6.69	0%	6.74	1%	7.32	9%	7.58	4%	8.19	8%
101-300	9.42	9.22	-2%	9.17	0%	9.71	6%	9.82	1%	10.29	5%

 Table 18: Existing and Proposed ABR



Tariff Revision (%) 301-500	FY FY 24-25 25-26		FY 26-27		FY 27-28		FY 28-29		FY 29-30		
											12.24
	LT II (a) - 0-20 kW	10.66	9.27	-13%	9.22	0%	9.83	7%	10.01	2%	10.49
LT II (b) > 20 kW	11.58	9.79	-15%	9.80	0%	10.45	7%	10.62	2%	11.13	5%
LT III (a) - LT Industrial upto 20 kW	9.73	8.14	-16%	8.09	-1%	8.75	8%	8.93	2%	9.46	6%
LT III (b) - LT Industrial above 20	11.04	9.09	-18%	9.02	-1%	9.63	7%	9.77	1%	10.24	5%
kW											
LT IV: PS	10.65	8.21	-23%	8.20	0%	8.91	9%	9.16	3%	9.72	6%
LT V (a): Agriculture - Pumpsets	7.93	7.98	1%	7.96	0%	8.74	10%	9.09	4%	9.69	7%
LT V (b): Agriculture - Others	9.90	7.96	-20%	8.08	1%	8.84	9%	9.28	5%	9.86	6%
LT VI: EV Charging Stations	8.67	8.67	0%	8.63	-1%	9.21	7%	9.44	2%	10.03	6%



10 PRAYERS

In view of the above, AEML-D prays before the Hon'ble Commission to:

- 1. Admit the petition as submitted herewith;
- Approve the actual revenue gap/ surplus arising on account of truing-up for FY 2022-23 and FY 2023-24 along with the carrying cost as worked out in this petition;
- 3. Approve the provisional ARR and revenue gap/ surplus for FY 2024-25 as worked out in this petition;
- Approve the cumulative revenue gap till FY 2024-25 along with carrying / holding cost as worked out in this petition and allow recovery of the same in the manner as presented in this petition;
- 5. Approve the ARR for each year of the Control Period i.e. FY 2025-26 to FY 2029-30 as projected in this Petition;
- 6. Approve the consideration of implementation of Smart Meters under the TOTEX Model.
- Approve the Retail Tariffs inclusive of Energy charges, Fixed / Demand charges, Wheeling Charges, Cross Subsidy Surcharge, Green Tariffs as proposed in this Petition for each year of the Control Period i.e. FY 2025-26 to FY 2029-30;
- 8. Approve the revision in Schedule of Charges as proposed in this petition;
- Allow for specific deviations wherever sought in this petition from the MYT Regulations, 2019 and MYT Regulations. 2024 and other Regulations mentioned herein in the petition;
- 10. Grant specific relief, wherever made in this petition, for reconsideration / relaxation of rulings;
- 11. Allow additions/ alterations/ modifications/ changes to the Petition at a future date;
- 12. Allow any other relief, order or direction, which the Hon'ble Commission deems fit to be issued.

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Manish Kumar Authorized Representative Adani Electricity Mumbai Limited

Mumbai January 6, 2025